

Exhibit A

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

LADY MAAKIA CHARLENE SMITH,)
personal representative of the Estate of BILAL)
HASANIE HILL, deceased,)

Plaintiff,)

v.)

Case No. 4:20-CV-00804-JMB

ADVANCED CORRECTIONAL)
HEALTHCARE, INC.; DR. ARTHUR)
BENTLEY, Individually and in His Official)
Capacity as a Medical Services Provider at)
Phelps County; DIONNE KELLEY; KELLY)
RATCLIFF, LIEUTENANT JOE TAYLOR;)
DR. TRAVIS SCHAMBER,)

Defendants.)

DECLARATION OF LADY MAAKIA CHARLENE SMITH

I, Lady Maakia Charlene Smith, pursuant to 28 U.S.C §1746, hereby declare as follows:

1. The journey to achieving justice for Bilal has been an extremely stressful ordeal.
2. My primary concern was making sure that Bilal was settled with his family in Charlotte, NC, and had access to the best compassionate medical treatment possible. However, it was equally important to me that those responsible for his inhumane treatment were held accountable for their actions, or in this case, inaction.
3. The process of obtaining legal counsel on his behalf was overwhelmingly difficult and full of obstacles.
4. At the beginning of this journey, I made several attempts to find a law firm that was experienced, capable, and willing to take on Bilal's case.

5. I contacted eleven law firms in Missouri, but each one declined to take on this case. One of the main reasons they communicated for their refusal was the concern that it would be an extremely hard case to take on.

6. The legal fees posed by some of these firms was another major issue. Although these firms did not proceed with this case, they urged me to proceed with a law firm that had the resources to take on a case of this gravity.

7. In addition to seeking legal counsel, I made several attempts to bring Bilal's case to the attention of organizations and individuals known for their work in the civil rights and social justice arenas. One of the individuals I attempted to contact was Mr. Lee Merritt, a civil rights attorney. I also attempted to contacted Mr. Shaun King, a civil rights activist and journalist, in hopes of bringing Bilal's case to the public's attention.

8. Unfortunately, neither of these attempts were successful in spreading awareness of Bilal's treatment or in obtaining legal counsel on Bilal's behalf.

9. In April of 2020, I was finally able to secure legal counsel willing to proceed with Bilal's case.

10. From the initial engagement, and along every step of the way, Charles Eblen with Shook, Hardy & Bacon and his team have been a tremendous godsend to my family. The firm and the team dedicated to this case worked diligently and went above and beyond in their attempt to seek justice for Bilal. The Shook team also showed tremendous compassion towards Bilal.

11. Shook's willingness to take on Bilal's case lifted a huge burden off my shoulders, such that I could turn my full attention to ensuring that Bilal's remaining days were filled with love, quality care, and the quality of life denied to him by ACH. My family and I will forever be grateful for this team's hard work and the opportunity to do what I only prayed would be possible in the beginning of this journey, obtain justice for Bilal.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 15, 2022.

 6/15/22
Lady Maakia Charlene Smith